

Clayman Rosenberg  
Kirshner & Linder LLP

305 Madison Avenue  
New York, NY 10165  
T: 212-922-1080  
F: 212-949-8255

Wayne E. Gosnell, Jr.  
Partner  
gosnell@clayro.com

September 12, 2024

BY ECF

Hon. Frederic Block  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: United States v. Lanni, et. al., 23 Cr. 443 (FB)

Dear Judge Block:

We are the attorneys for Vito Rappa, who is charged in the above-referenced indictment. We submit this letter to request a modification of Mr. Rappa's pre-trial release conditions to permit him to travel to Sinking Spring, Pennsylvania for work on Monday, September 16, 2024. The specific address has been provided to Pre-Trial Services.

We previously conferred with Pre-Trial Services Officer Joohn Kim (EDNY) and the United States Attorney's Office for the Eastern District of New York, both of which had no objection to Mr. Rappa's request.

Thank you for your attention to this matter.

Very truly yours,  
/s/  
Wayne E. Gosnell, Jr.